

# **EXHIBIT 5**



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March 22, 2019

VIA EMAIL

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Re: In re Dealer Management System Antitrust Litig., MDL No. 2817, Cox v. CDK (18-CV-1058)

Dan,

We spoke with Mike yesterday about several of the open Cox discovery issues and he suggested we follow-up in writing on the below items:

- Autotrader Data License Agreement: We had understood Cox to be requesting reasonable proposals for discovery on CDK's claim, based on your March 14, 2019 letter. The suggested categories in my March 19th letter were in response to that offer. Per the comments in your March 20th letter and Mike's suggestion on the call yesterday, we have attempted to narrow the categories of documents proposed to be produced by Cox. Please let us know if Cox will agree to produce these materials, and if it is not able to do so by April 5th, when they will be produced:
  - Any documents Cox may rely upon to support its affirmative defenses relating to the Data License Agreement;
  - Documents discussing the SRP and VDP metrics contemplated by the Data License Agreement not previously provided to CDK.
  - Documents sufficient to show any third parties to whom Autotrader licenses SRP and VDP metrics.
- Financial Data: We appreciate Cox's commitment to produce documents as soon as it can, but as you know the Rule 30(b)(6) deposition on data is scheduled for April 4th. The concerns with outstanding financial data were raised in Mr. Fenske's letter on March 6th, and my understanding is that the documents should have been produced long ago. When will Cox produce the outstanding documents?

Daniel V. Dorris, Esq.  
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Sincerely,

*/s/ Robert E. Entwistle*

Robert E. Entwistle